

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**RECEIVED**
12/20/2020 LK
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTMeria I. Rodriguez

Plaintiff(s),

Case Number: **1:20-CV-7608****JUDGE FEINERMAN
MAGISTRATE JUDGE GILBERT**v. Town of Cicero, LarryDominick Serge Rocher
list of parties continue on
Defendant(s). next pageCOMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.

2. The plaintiff is Meria Irma Rodriguez of the
county of Kane in the state of Illinois.3. The defendant is Town of Cicero, Larry Dominick, Serge Rocher whose
list of parties continued on another page with same address
street address is 4949 W Cermak Blvd.(city) Cicero (county) Cook (state) Ill (ZIP) 60804(Defendant's telephone number) (708)-656-3600

4. The plaintiff sought employment or was employed by the defendant at (street address)

4949 W Cermak Blvd (city) Cicero
(county) Cook (state) Ill (ZIP code) 60804

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

~~Defendants continued~~

Serge Rocher - Defendant

Oscar Clay - Defendant

Christopher Tomosino - Defendant

Ricardo Pina - Defendant

Cicero Police Department - Defendant

Larry Polk - Defendant

Jerry Chalda - Defendant

Emo Cundari - Defendant

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

5. The plaintiff [*check one box*]

- (a) ☐ was denied employment by the defendant.
- (b) ☒ was hired and is still employed by the defendant.
- (c) ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) December (day) 5th, (year) 2019.7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

- (a) The defendant is not a federal governmental agency, and the plaintiff [*check one box*] ☒ has ☐ has not filed a charge or charges against the defendant

asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) ☒ the United States Equal Employment Opportunity Commission, on or about

(month) September (day) 11th (year) 2020

- (ii) ☐ the Illinois Department of Human Rights, on or about

(month) _____ (day) _____ (year) _____.

- (b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. ☒ Yes, ☐ No, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the

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[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

defendant asserting the acts of discrimination indicated in this court complaint.

☐ Yes (month) _____ (day) _____ (year) _____

☐ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month) _____

(day) _____ (year) _____.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☐ Yes ☐ No, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ Yes ☐ No, but a copy will be filed within 14 days.

8. (Complete paragraph 8 only if defendant is not a federal governmental agency.)

(a) ☐ the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) October (day) 27 (year) 2020, a copy of which

Notice is attached to this complaint. Also see Additional pages

9. The defendant discriminated against the plaintiff because of the plaintiff's [*check only those that apply*]:

(a) ☒ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

- (c) ☐ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☐ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☒ Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the ADA by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791; and for the ADEA, 29 U.S.C. § 626(c).
12. The defendant [*check only those that apply*]
- (a) ☐ failed to hire the plaintiff.
- (b) ☐ terminated the plaintiff's employment.
- (c) ☒ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☒ other (specify): Quid Pro Quo, see additional pages

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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to Larry Dominick that I wasn't
interested in dating him or anyone
that wasn't divorced. as I just had
lived a nightmare with ex-Police Chief
Lori Letts. Continued on next pages.

13. The facts supporting the plaintiff's claim of discrimination are as follows:

Plaintiff since her employment began reported a sexually
hostile work environment, being sexually harassed,
retaliated against by the offenders whom were
rewarded and/or never disciplined. Larry Dominick
created a severe sexual hostile work environment
See Additional Pages

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☐ Yes ☐ No

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff
[check only those that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
 (b) ☐ Direct the defendant to re-employ the plaintiff.
 (c) ☐ Direct the defendant to promote the plaintiff.
 (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
 (e) ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.

- (f) ☐ Direct the defendant to (specify): pay Plaintiff for pain,
suffering, lost wages and ASK the Court
to Appoint a monitor to change severely toxic
sexually hostile, see additional pages

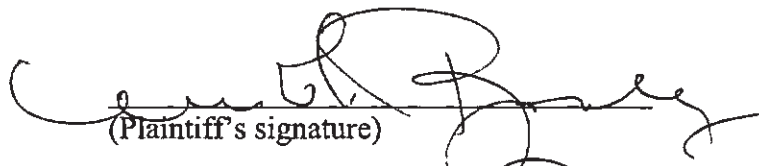
[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

⁶
environment and to report back to
this Court for a status on changes
made that will give us females hope.

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☒ Grant such other relief as the Court may find appropriate.


(Plaintiff's signature)

Maria Irma Rodriguez
(Plaintiff's name)

84 S. Main Street #1, P.O. Box 864
(Plaintiff's street address)

(City) Sugar Grove (State) IL (ZIP) 60554

(Plaintiff's telephone number) (312) - 925-5883

Date: 12/19/2020

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

EEOC Form 5 (11/09)

| | | | |
|---|--|---|------------------------------------|
| CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form. | | Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 440-2020-05772 | |
| ILLINOIS DEPARTMENT OF HUMAN RIGHTS and EEOC <i>State or local Agency, if any</i> | | | |
| Name (indicate Mr., Ms., Mrs.) MS. MERIA RODRIGUEZ | | Home Phone (312) 925-5883 | Year of Birth 1959 |
| Street Address City, State and ZIP Code 84 MAIN STREET, APT#1, SUGAR GROVE, IL 60554 | | | |
| Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.) | | | |
| Name TOWN OF CICERO | | No. Employees, Members 15 - 100 | Phone No. (708) 656-3600 |
| Street Address City, State and ZIP Code 4949 W CERMAK BLVD, CICERO, IL 60804 | | | |
| Name | | No. Employees, Members | Phone No. |
| Street Address City, State and ZIP Code | | | |
| DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify) | | DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 05-01-2018 09-11-2020 <input checked="" type="checkbox"/> CONTINUING ACTION | |
| THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): | | | |
| <p>I was hired by Respondent in 2007. My current position is Parking Enforcement. I previously filed an EEOC Charge of Discrimination (Charge #440-2018-03723). Subsequently, I was harassed and moved to the Parking Department. Since in or around December 2019, I have been sexually harassed, disciplined, and subjected to different terms and conditions of employment, including, but not limited to, required to produce more than younger similarly situated coworkers, spoken to in a condescending tone, and had my Workers' Compensation claim denied.</p> <p>I believe I have been discriminated against because of my national origin, Hispanic, sex, female, and in retaliation for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.</p> <p>I also believe I have been discriminated against because of my age, 61, and in retaliation for engaging in protected activity, in violation of the Age Discrimination in Employment Act of</p> | | | |
| I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. | | NOTARY - When necessary for State and Local Agency Requirements | |
| I declare under penalty of perjury that the above is true and correct. | | I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT | |
| Digitally signed by Meria Rodriguez on 09-11-2020 05:11 PM EDT | | SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) | |

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA

☒ EEOC

440-2020-05772

ILLINOIS DEPARTMENT OF HUMAN RIGHTS

and EEOC

State or local Agency, if any

1967, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

**Digitally signed by Meria Rodriguez on 09-11-2020
05:11 PM EDT**

NOTARY – *When necessary for State and Local Agency Requirements*

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Meria Rodriguez**
84 Main Street, Apt#1
Sugar Grove, IL 60554

From: **Chicago District Office**
230 S. Dearborn
Suite 1866
Chicago, IL 60604



On behalf of person(s) aggrieved whose identity is
~~CONFIDENTIAL~~ 29 CFR §1601.7(a)

EEOC Charge No.

EEOC Representative

Telephone No.

440-2020-05772

Jerry Zhang,
Investigator

(312) 872-9694**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Julianne Bowman/ti

September 16, 2020

Enclosures(s)

Julianne Bowman,
District Director

(Date Mailed)

cc:

Larry Dominick
Town President
THE TOWN OF CICERO
4949 W. Cermak Rd.
Cicero, IL 60804

Section 8(b) PAGE 3

I didn't receive the Right To Sue Letter until October 27, 2020. I immediately went to speak to the Postmaster named Cynthia Bender as to why the delay on my letter from EEOC and Human Rights Arrived so late from the date stamped on the separate envelopes and she had no explanation but gave me her name. I contacted by email and left telephone message for my investigator Jerry Zhang and he returned my call that day but could not help me. Also received an email from EEOC that day and couldn't help me but I submitting copies of the envelopes which EEOC has 2 dates one being August 14, 2020 and the other September 17, 2020.

Section 8(b) Page 3

CHICAGO DISTRICT OFFICE
EMPLOYMENT OPPORTUNITY COMMISSION
S. DEARBORN, SUITE 1866
CHICAGO, ILLINOIS 60604

OFFICIAL BUSINESS

CHAMPAIGN IL 618

17 SEP 2020 PM 4



U.S. POSTAGE PITNEY BOWES



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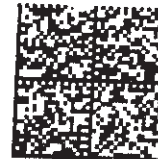


STATE OF ILLINOIS

Department of
Human Rights

585 W. Jefferson Street
1st Floor
Springfield, Illinois 62702

POSTAGE METER #6614



U.S. POSTAGE PITNEY BOWES



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09-25-20 SPFLD IL 627

204 BMGVNAB 60554



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Continued from page 4 12(h)
Section 12(h)

1. Harry Dominick, Town President, Quid Pro Quo sexual harassment, asked what he could do for me after working part time for 7 years he gave me a mental full time position which is how he does this to all potential sexual relationships as he has a pattern with numerous employees. He gave me gifts of cubs ticket to 2 games, 2 tickets to his Annual Golf outing and other gifts. Then he asked me to set him up with a girlfriend of mine. I made a couple of attempts but none of them were interested in him. He would wait in Wahlgreens parking lot to talk to me and ask me to go for a ride, pull up when I was getting into my car numerous times, tell me I was sexy and gorgeous and why I look gorgeous everyday, even called me at switchboard in the evening to talk once and I was just polite. After dealing with him personally after he was not getting what he wanted he retaliated by not considering the numerous requests to be

PAGE 4 12(h) PAGE 12 (#1)

continued from Page 4, section
12(h) - (2) -

promoted or a better paying position. I repeatedly sent emails to Human Resources but was advised no positions were available. Soon after marrying his current wife Diana Dominick he hired her at a rate of pay of \$32,000 with no experience. See Attached pre-employment Application for Diana Dominick. This has been a pattern of Quid Pro Quo by Town President Larry Dominick to include an FBI case with recording, involving ex-employee Sharon Starzyk, then there was ex-employee Janedette LuJano, ex wife and ex employee ~~Elizabeth~~ Elizabeth Dominick who like his current wife employee Diana Dominick saw their salaries double and more plus promotions to Directors of Town Departments shortly after being hired. Serge Pacher has promoted or promised to promote Vashti Lopez, Nadia Bull and others for having a relationship or possibly having one with him. Oscar Clay also participated in Quid Pro Quo with Alicia Mendez, Lizbeth Esparza and numerous other females with promotions or more desirable positions.

Page 4 12(h)

- (2) -

President Harry Dominick regarding Ofc. Lujano, Ofc. Mendez, CSO ~~SANTO~~. Numerous others. Harry Dominick has fostered a sexualized culture and toxic workplace and a quid pro quo environment and male employees are aware if there is a complaint against them they will be rewarded and the female complaining will be dealt with. On August 23, 2018 I complained of sexual harassment by Water Dept. Supervisor David Duran only because I was assured by Town Attorney Michael Del Galdo that I shouldn't be afraid and to file the complaint and he really did try to help me and the other females. See Attached email from attorney Del Galdo and the non-disclosure ~~attached~~ letter I transferred to the new position per the Agreement on January 22, 2018. On June 2018 I complained of the sexually hostile environment that I am working in with the same offenders Oscar Clay the Deputy of Community Service Office who is dating another co-worker Ofc. Esparza a new community officer who in the quid-pro quo state in the Town of Cicero is now in a desirable position in the Evidence Dept. because of her relationship with her boss, Oscar Clay. So even with due diligence ~~intending~~ to help us females Town Attorney Michael Del Galdo can't change the conditions that Harry Dominick, Serge Rocher, Oscar Clay and others subject us to.

Section 12 (H) - 3 - Page 4

Revised 11/1/11

PRE-EMPLOYMENT APPLICATION

THE TOWN OF CICERO, ILLINOIS is an equal opportunity employer. It strictly prohibits discrimination against its employees, and against applicants for employment on the basis of race, color, sex, religion, ancestry, national origin, age, military status, political affiliations, citizenship status, sexual orientation, marital status, physical or mental disability (unrelated to ability to perform the duties of the position being applied or the position being fulfilled) or any other class protected by State or Federal law.

Each question herein shall be completely and accurately answered by the applicant. If the applicant cannot read the Application and another person reads it to the applicant and assists the applicant in writing his/her answers on the Application, then the assisting person must also sign and date this Application, as a witness, and take the oaths of truthfulness and completeness.

Incomplete or incorrect answers are cause to disqualify the applicant from securing employment with the Town of Cicero.

1. State the position being applied for with this Application: SARAH BENTER
Full Time ☒ Part Time ☐
2. Date Application is submitted: 08/22/2018
3. Name of Applicant: DIANA DOMINICK
4. Address of Applicant: [REDACTED]
5. Phone Numbers: Home: [REDACTED]
Cell: [REDACTED]
6. E-Mail Address: [REDACTED]
7. Date of Birth: [REDACTED] Current Age: [REDACTED]
8. Social Security Number: [REDACTED]
9. Place of Birth: LIMA - PERU
If not born a United States citizen, what is your current U.S.A. residency status?
U.S. CITIZEN

12(H)

Page 4 Section 12 (H)

CURRENT AND FORMER EMPLOYMENTAre you currently employed: Yes ☐ No ☐

If yes, please explain in detail: _____

Please list all employment you have had for the last ten (10) years, as follows:

| | <u>Name of Employer</u> | <u>Job(s) Held</u> | <u>Rate of Pay</u> | <u>Dates Employed</u> | <u>Reason for Leaving</u> |
|----|-------------------------|--------------------|--------------------|-----------------------|---------------------------|
| 1. | _____ | _____ | _____ | _____ | _____ |
| 2. | _____ | _____ | _____ | _____ | _____ |
| 3. | _____ | _____ | _____ | _____ | _____ |
| 4. | _____ | _____ | _____ | _____ | _____ |
| 5. | _____ | _____ | _____ | _____ | _____ |

How many days did you miss from work last year for which you did not receive pay: _____ days.

CURRENT REFERENCES

| | <u>Name/Address</u> | <u>Telephone No.</u> | <u>Nature of Referral</u> |
|----|---------------------|----------------------|---------------------------|
| 1. | _____ | _____ | _____ |
| 2. | _____ | _____ | _____ |
| 3. | _____ | _____ | _____ |

DRUG USEDo you use illegal drugs as defined by the Illinois Controlled Substances Act, 720 ILCS 570 et seq. Yes ☐ No ☐

12 (H)

32,000.00

Page 8, Section 13 (1)

for females. He was also discriminatory against minorities, see Attached EEOC order dated 01/31/18. Black people are still not being hired, of the approximately 600 employees 6 are black. Of the other minorities employed by the Town of Cicero, Brown People having not fared any better because they are the lowest paid with an Average salary of \$25,000. and Supervisory positions are held by White people with the exception of Larry Dominick's current wife and may be one other Brown person. I was sexually harassed by Water Department Supervisor David Duran, on August 22, 2017, and only with the advice of Town of Cicero Attorney Michael DelGaldo did I write a report on the incident, see Attached pages, then After taking a new position as part of a non-disclosure letter Agreement, I then reported a sexually hostile work environment with Human Resources about Deputy Supt. Oscar Clay and was retaliated ~~was~~ against by Chief Deputy Serge Rodier, Ricardo Pina, Oscar Clay and Christopher Tamosino, See Attached documentation as proof of retaliation which transpired within 2 days of each other. Requested to be moved and/or promoted but eventually was retaliated against by being transferred back to the department that the Town knew was a position I wouldn't have accepted to sign a non-disclosure letter. Immediately after taking the position because I was ordered to Deputy Supt. Larry Polk sexually harassed me and retaliated also.

of Cicero command staff to include same employees that are still continuing with sexual harassment Quid Pro Quo and retaliation against females, see attached reports, which show my complaints and see attached letter from Office of the Inspector General James T. Klosak where they started to retaliate against me for reporting and cooperating with an and all investigations by putting in my file unknown to me disciplinary actions, and discovered on October 11, 2011.

1. list of Defendants that sexually harassed Plaintiff:

1. Harry Dominick - Town President
2. Oscar Clay - Chief Deputy CSO's
3. Larry Polk - Chief Deputy Cicero Police

Beginning on or about 05-01-2018, Plaintiff has been subjected to sexual discrimination, ~~and~~ Quid Pro Quo sexual harassment, hostile workplace environment and continued sexual harassment.

1. Deputy Supt. Larry Polk sexually harassed Plaintiff on numerous occasions and I complained to Joseph Kusper, Human

~~Re~~ Continued on #13 Page 5

Resource Director and Julie Diemer Town Attorney on numerous occasions of Larry Polk's sexually offensive acts. See attached reports. Sexual harassment by Oscar Clay see attached reports.

Retaliation has been ongoing against Plaintiff since at least 2009. Starting with Deputy Ricardo Pina as my Supervisor as an Auxiliary Police Officer with the Town and he still continues to retaliate as my former Supervisor in the office of Community Service Force, ~~then~~ On 07-24-2018 Ricardo Pina was going to serve me with a write up disciplinary for an incident ~~at~~ that occurred at work with Plaintiff. Dep. Supt. Serge Rocher with Dep Oscar Clay present. I advised Pina I was being retaliated against by him. Rocher, Oscar Clay's brother Christopher Tommasino a Deputy Supt. in my dept for compliance of Oscar Clay's creating a very sexually hostile work environment. Plaintiff went to file another complaint with Human Resources and the Inspector General and the Police dept. see attached documentation. On July 25, 2018 Ricardo Pina and Christopher Tommasino arrive at the office and say they want to serve me with new work

orders. This time I stake them be-
 cause I was never Allowed to get a
 copy of disciplinary charge from pre-
 vious day. I went directly to Human
 Resources to see Sarah Kusper but
 she wasn't in but Toni Sweetman.
 H/R Assistant took a copy of my new
 work order. I was called in a couple
 hours later to Sarah Kusper's office
 and she handed me a memo stating
 the Town hadn't Authorized the change
 to my work duties, see attached doc-
 uments. I advised Sarah I would
 have never agreed to a driving
 position in my signing of a dis-
 closure letter of sexual harassment.
 see attached letter. On 12-05-2019
 I was served with a letter that
 my office was closing as ~~all~~ Community
 Service personal were going to be
 reporting to the Police Dept which
 was another retaliation because the
 office never closed and I was
 put in a non-desirable driving pos-
 ition in a department I had worked
 in where I was injured on duty.
 I emailed Sarah Kusper and Julie
 Deiner about the retaliatory move. See
 attached document #3-

Comp. claim which was in retaliation for complaining of sexual harassment and retaliation. Plaintiff's requests to file and document the injury that occurred on February 18, 2020 until February 24th 2020 after numerous complaints to Sarah Kasper, Cindy Updike, Dep. Supt. Harry Polk, see Attached documents. So I filled out FMLA paper per Chief Chalda or should I ~~say~~ say ordered to on February 24th the same day or again it was the evening of the that date that I even was allowed to write a to and from of my work injury of Feb 18, 2020. I was well aware then my Workman's Comp claim was ~~g~~ already denied before filing in part because of my allegations of Workman's Comp fraud involving Harry Dominick's brother-in-law Paul Dembowski the Town's Internal Affairs General Inspector, after receiving anonymous letter sent to my home address. See Attached letter and copy of a check for \$71,547.00 per the sender this is one of many for Paul Dembowski. Town has violated FMLA Cicero Police Department #921, dated November 20, 2020 which employees signed for a copy on December 8, 2020, Section V.I.B. Intermittent Reduced Schedule Leave.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Chicago District Office

500 West Madison St., Suite 2000
Chicago, IL 60661
PE (312) 869-8000
TTY: (312) 869-8001
ENFORCEMENT FAX (312) 869-8220

NOTICE TO ALL EMPLOYEES
RACE DISCRIMINATION IS ILLEGAL

The U.S. Equal Employment Opportunity Commission (EEOC) has entered into a Conciliation Agreement with the Town of Cicero in relation to an investigation as to if the Town violated Title VII of the Civil Rights Act of 1964, as amended (Title VII), by failing to recruit and hire Black applicants. EEOC has required the Town of Cicero to post and abide by this Notice. This Notice is part of a Conciliation Agreement between the Town of Cicero and the EEOC which resolves the Charges of Discrimination. The Town of Cicero, its supervisors and agents will continue to support and comply with Federal Law which prohibits discrimination, harassment, and retaliation against any employee or applicant because of an exercise of rights under the law. For the duration of the Agreement, the Town of Cicero will develop and implement a recruitment plan to increase the number of qualified applicants and increase the hiring rate of qualified employees who are Black. The Town of Cicero will provide training to better educate its management and HR employees regarding its obligations under the cited statute. The Town of Cicero will also report to the EEOC on its compliance with Title VII.

Federal law prohibits retaliation against any applicant or employee because the applicant or employee files an employment discrimination charge against the employer, opposes employment discrimination, or cooperates with or participates in the Government's investigation of a charge of discrimination.

Should you have any complaints or questions regarding employment discrimination, you can contact the EEOC office at the address and telephone number shown above.

THIS IS AN OFFICIAL NOTICE AND MUST NOT BE DEFACED. This notice must remain posted as agreed upon by all parties and must not be altered, defaced, or covered by any other material. Any questions concerning this notice or compliance with its provisions may be directed to the EEOC at the above address and telephone number.

EEOC is responsible for enforcing Title VII of the Civil Rights Act of 1964, as amended, which prohibits employment discrimination based on race, color, sex, or national origin; the Age Discrimination in Employment Act of 1967, as amended; the Equal Pay Act of 1963; the Americans with Disabilities Act of 1990, as amended, and the Genetic Information Non-discrimination Act of 2008.

3/11/18
Date

[Redacted Signature]

Julianne Bowman, District Director
Chicago District Office

3/15/18
Date

[Redacted Signature]
Town of Cicero

Town of Cicero Mail - Retaliation for complaints of sexual harassment, whistleblowing o... Page 1 of 2



Sarah Jelic <sajelic@thetownofcicero.com>

Retaliation for complaints of sexual harassment, whistleblowing on corruption.

3 messages

meria rodriguez [REDACTED] Fri, May 15, 2020 at 7:18 AM
Reply-To: [REDACTED]
To: Sarah Jelic <sajelic@thetownofcicero.com>, Julie Diemer <diemer@dlglawgroup.com>, Michael Del Galdo <delgaldo@dlglawgroup.com>, Jim Klosak <jklosak@thetownofcicero.com>

Good morning Sarah, Another incident of retaliation for complaining of sexual harassment and whistleblowing on the corruption that is going on within this town by employees including companies owned by employees Polchan, Chlada, Terricino, Schultz, Cundari's deceased mother-in-law ect. getting paid for non-work and boats and non-town vehicles to include 2 boats and an ice cream truck stored in Town garage. I had chronic pain from my neck and shoulder that were work accidents and I wrote to you with my concerns about this but as retaliation I was transferred anyway. Many employees even for taking bribes, ghost payrolling etc. not only still have employment but get better positions. I am and always was willing to come to work on light duty but am denied even though there's light duty positions for politically connected employees some for years. I am requesting to come to work on light duty. Respectfully, Meria

Sent from Yahoo Mail on Android

meria rodriguez [REDACTED] Fri, May 15, 2020 at 7:27 AM
Reply-To: [REDACTED]
To: Sarah Jelic <sajelic@thetownofcicero.com>, Julie Diemer <diemer@dlglawgroup.com>, Michael Del Galdo <delgaldo@dlglawgroup.com>, Jim Klosak <jklosak@thetownofcicero.com>

My error I also wanted to add as I emailed on Tuesday obviously I believe that he was harassing me telling me that I have to do more than 93 tickets, "I gotta step it up", "you got to do it" on this quota of tickets written which I know other employees are not even without injury and old age are not producing that many tickets and all of this is just another way to harass me. Do you think putting up with Polk is easy as he makes comments as he's looking me up and down and telling me he loves my boots and other conversations that were offensive?? Meria

Sent from Yahoo Mail on Android

[Quoted text hidden]

Julie Diemer <diemer@dlglawgroup.com> Fri, May 15, 2020 at 7:35 AM
To: Jerry Chlada <jchladajr@thetownofcicero.com>
Cc: Sarah Jelic <sajelic@thetownofcicero.com>, Michael Del Galdo <delgaldo@dlglawgroup.com>, Jim Klosak <jklosak@thetownofcicero.com>

I'll respond and bcc all of you.

On May 15, 2020, at 7:27 AM, meria rodriguez <[REDACTED]> wrote:

My error I also wanted to add as I emailed on Tuesday obviously I believe that he was harassing me telling me that I have to do more than 93 tickets, "I gotta step it up", "you got to do it" on this quota of tickets written which I know other employees are not even without

Town of Cicero Mail - Retaliation for complaints of sexual harassment, whistleblowing o... Page 2 of 2

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[Quoted text hidden]

Town of Cicero Mail - Unreasonable quota on parking tickets.

Page 1 of 1



Sarah Jelic <sajelic@thetownofcicero.com>

Unreasonable quota on parking tickets.

Meria Rodriguez [REDACTED]

Tue, May 12, 2020 at 5:53 PM

Reply-To: [REDACTED]

To: Larry Polk <lpolk@thetownofcicero.com>, Sarah Jelic <sajelic@thetownofcicero.com>, Steve Smalling <sjs@capronlaw.com>

Good afternoon again , being in our two phone conversations we had today you are not realizing the pressure and the unattainable quota you want me to write on parking tickets for tomorrow. As I told you in our two conversations when I was trying to explain to you but you didn't want to hear that, first of all the extreme amount of pain I am in from my work related incident. Especially after last Thursday and Friday of having to get out of the car a minimum of 300 times to put notices on individual cars. Being I can't take my prescribed medication it was unbearable pain today after writing 93 tickets in this pain getting out my car minimum of 200 times. I would've written more but I kept being accosted by the residents because they were getting a parking ticket constantly. I even was not able to take more than 1 bathroom break it because I knew how time consuming that is because there is only one building we're allowed to use and didn't take my lunch till 2pm. But I am over 60 years old and even if I didn't have an injury couldn't produce what the much younger parking enforcements officers are able to do. And also considering they do not get in-and-out of the car hardly at all are saving time and physical impact on their route. I advised you I was not able to "step it up" as you told me and that I can do it. Again I am injured , old and not capable of stepping it up. Meria

Sent from Yahoo Mail on Android

Town of Cicero Mail - Hostile Work Environment

Page 1 of 1



Sarah Jelic <sajelic@thetownofcicero.com>

Hostile Work Environment

2 messages

Merla Rodriguez

Tue, Jun 9, 2020 at 1:07 PM

Reply-To:

To: Sarah Jelic <sajelic@thetownofcicero.com>, Julie Diemer <diemer@diglawgroup.com>

Sarah, would like to meet to discuss the retaliation especially in relation to my work injury of February 18, 2020. Meria

Sent from Yahoo Mail on Android

Sarah Jelic <sajelic@thetownofcicero.com>

Wed, Jun 10, 2020 at 2:40 PM

To:

Meria:

I am in receipt of your email alleging a complaint of retaliation. Pursuant to the Town's Personnel Manual, this complaint will be investigated by the Department of Human Resources. All complaints shall be treated in a confidential manner to the extent possible.

Please provide a written statement detailing your allegation.

Thank you.

[Quoted text hidden]

—
Sarah Kusper, PHR
Town of Cicero
Department of Human Resources
708.656.3600 Ext. 441
708.656.2575 Facsimile

Re: Harrassment and Retaliation

From: Michael Del Galdo (delgaldo@dlglawgroup.com)
To: meriameria2@yahoo.com
Cc: jklosak@thetownofcicero.com; sajelic@thetownofcicero.com
Date: Monday, December 10, 2018, 9:21 PM CST

We need to wrap up the initial one as soon as possible, and figure out away to contain her craziness

Sent from my iPhone

On Dec 10, 2018, at 2:12 PM, meria rodriguez <meriameria2@yahoo.com> wrote:

Mr Klosek , for information purposes on December 5, 2018 at approximately 4:20 pm, in the Executive parking lot at the rear of the Town Hall building , I was taunted by Larry Dominick who was with Maria Medina as I was about 10 feet from them he states to her " she's probably going to want you next". As I had reported to Sarah Kuser before how after I tried reporting Serge Rocher to the police department after the incident by the courtroom and Larry Dominick had driven by my work location and stuck his middle finger up at me. Which brings me to today because the Town has a pattern of retaliatory behavior and just speaking about me all tires slashed and death note left, investigated for a residential burglary at Police Chief home ect. I spoke to Sarah again on November 5th and mentioned to her that on October 31st, I believe I was intentionally run off the road and caused me to rollover my car and told Sugar Grove police to please note that. Then on Thursday December 6 I sent an email to you Mr. Klosak that I had read the lawsuit by Rose and Wayne Porod and the physical violence allegations in it just validates my concerns for my life. Well today as I was going to proceed down my stairs to go to work I saw my 2019 brand new car blocking the stairs. The video of my car being struck at 12:13am last night appears suspicious. This has caused me tremendous mental anguish and financial problems. Meria

Sent from Yahoo Mail on Android

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Sent from Yahoo Mail on Android

THIS IS A CONFIDENTIAL COMMUNICATION: The preceding e-mail message may contain information that is confidential and/or subject to a legal privilege, including, but not limited to, the attorney/client privilege. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify the sender at 708-222-7000. The unauthorized use, dissemination, distribution or reproduction of this message is strictly prohibited. Unintended transmission does not constitute waiver of the attorney-client privilege or any other privilege. Unless expressly stated in this email, nothing in this message should be construed as a digital or electronic signature

Subject: Towing Department Position

From: meriameria2@yahoo.com

To: sajelic@thetownofcicero.com; diemer@dlglawgroup.com; delgald@dlglawgroup.com

Date: Friday, April 13, 2018, 7:47:31 AM CDT

Good morning Sarah, I became aware of new positions even though there is no postings, by your department which is common as the only posting I have ever seen have been for crossing guards in my 11 years employed by the Town of Cicero. Interested in a position for the new Towing company which will be run by coincidentally recently retired assistant Police Chief Marlar, and I know they are employees being considered already but just wanted you to know I was interested in a position and possibly an office supervisor position in this newly-created department. Thank you. Meria Rodriguez

Sent from Yahoo Mail on Android

Page 5. Sect. 13 (13)

Subject: Re: Meeting

From: meriameria2@yahoo.com

To: delgaldo@dlglawgroup.com

Date: Thursday, January 4, 2018, 8:07:43 PM CST

Okay I'll see you on Wednesday at 2 p.m. and again thank you very much I really do appreciate it. And I hope you have a great weekend also. Meria

Sent from Yahoo Mail on Android

On Thu, Jan 4, 2018 at 7:25 PM, Michael Del Galdo
<delgaldo@dlglawgroup.com> wrote:

We can discuss it Wednesday, 2:00 p.m. in the Conference room adjacent to my office. I will ask Julie Diemer from the firm to be there as well, if you haven't met her, you will like Julie and Sarah Jelic is just trying to do here best to address your concerns, so I hope it to be a productive meeting.

Enjoy your weekend.

On Thu, Jan 4, 2018 at 6:41 PM, meria rodriguez <meriameria2@yahoo.com> wrote:

I would definitely be more comfortable meeting upstairs on the third floor but I don't believe anything will be accomplished as obviously Donald Schultz has the last word and this is been ongoing far too long and it could have been resolved. Thank you . Meria

Sent from Yahoo Mail on Android

On Thu, Jan 4, 2018 at 6:24 PM, Michael Del Galdo
<delgaldo@dlglawgroup.com> wrote:

Ms. Rodriguez - I want to ensure that your concerns are addressed, would you prefer to meet in the conference room by my office on the 3rd Floor? I asked Sarah Jelic from HR to attend, as I'm not as familiar with HR Policies and practices as her, but Mr. Schultz will not be at the meeting. Please let me know if you still wish to cancel the meeting or want it to proceed in the 3rd Floor Conference Room.

Thank you.

Mike

On Thu, Jan 4, 2018 at 6:15 PM, meria rodriguez <meriameria2@yahoo.com> wrote:

Good evening Mr. Del Galdo, in reference to the conversation with Cindy earlier just want to advise you that the meeting is not necessary and thank you for your concern for my well-being and help. I am not willing to meet in human resources as I believe Donald Schultz has what I believe a bias opinion of me as an employee and you as counsel for the town of Cicero. Sincerely, Meria

Sent from Yahoo Mail on Android

--
Michael T. Del Galdo
Attorney at Law

Page 5. Sect. 13 (13)

page 5 section 13

January 22, 2018

To: Human Resources Department

From: Meria Rodriguez

Re: Transfer

I hereby acknowledge that I have requested to be transferred to a new position at the Town of Cicero. My current position is Switchboard Operator. I understand that the Town has no obligation to honor my request. I understand and agree that my new position, effective January 22, 2018, will be Administrative Assistant to the Deputy Superintendent of Community Service Officers, and that I will remain an at will employee. I understand and agree that my hours of work will be Monday through Friday from 8:00am - 4:00pm, and that my salary and benefits shall not be affected by this transfer to a new position and shall remain at their present levels.

I have not requested a new position as a result of any alleged retaliation for any complaint(s) that I have made regarding any alleged discrimination in the workplace. I have been given a copy of the Town of Cicero Personnel Manual and understand that any complaint(s) of discrimination shall be documented and investigated pursuant to the policies in the Personnel Manual and/or any applicable ordinance or law.

I have been given the opportunity to review this memorandum and to make any changes to it that I desire. The statements herein are true and accurate, and I affix my signature of my own free will and not under duress.


Meria Rodriguez


Witness


Witness Name (Printed)

Sarah Jelic

Add keywords

Section #13

Inbox

People

Compose

Messages

Photos

Documents

31

Inbox 999+

Unread

Starred

Drafts 169

Sent

More

Views Hide

Photos

Documents

Travel

Coupons

Purchases

Tutorials

Folders Hide

+ New Folder

Cicero

flowers Sal

Junk

untitled

Unwanted 1

From Sort

Last week

Wells Fargo AD
30K Bonus Points In...

me, Sa... 17 Sep 6
Sexual discrimination an...
Thank you. Sent from Ya...

August

me, Sar... 3 Aug 23
Sick day
Thanks. Sent from Yaho...

me, Sar... 2 Aug 8
Serge Rocher
Good Morning Meria, I c...

... 16 DRAFT Aug 7
Sexually hostile work en...
Sent from Yahoo Mail o...

Sarah, ... 2 Aug 2
EAP
Thank you. Meria...

June

me, Sar... 3 Jun 28
Victor Ayala
Thank you, Meria Sent fr...

Sarah, J... 8 Jun 7
★ Meeting: 5/8/18
Julie not represented by...

Sarah Jelic Jun 6
Meeting: 5/8/18

Re: Sexually hostile work environment

16

meria rodriguez <meriameria2@yahoo> Jun 12 at 8:05 AM
To: Sarah Jelic

Good morning Sarah, I have not been at work as I have not been able to sleep from the stress created since seeing Deputy Oscar Clay at a co-workers wedding reception with his date, another CSO that he has power over. And I should have known as he had given Deputy Pina orders 2 weeks prior that this new girl be given a special assignment. This is a very toxic atmosphere for another female to work in. Just like the situation I previously reported to you and Julie Delmer about Vashti Lopez who had reported to him, not Deputy Pina. I even asked him if she was his girl because he would be flirting and hanging out her at desk for long periods of time. But he stated she was "Serge girl", which I didn't believe for a minute as he has abused his power since we were auxiliary police starting with Alisha Mendez, Patricia Camacho etc., allowing them to report late and take with his knowledge, extended breaks and lunches and allowed to leave early, buying them uniforms and equipment on Town resources when the rest of the unit had to buy them and bringing Starbucks to him while he was on duty at Morton College, all the same perks that he continues to bestow on his next victim. With Vashti Lopez she was a CSO but never acted in that capacity she just did some clerical work and they created the position of Corporal and she was promoted to that position with a large increase in pay per hour for the same exact duties she was doing was a CSO. And like the previous females mentioned she was allowed to come and leave as she pleased. Since my reporting he has retaliated against me in the presence of his girl Vashti Lopez by telling me that it's not the Town responsibility to supply drinking water and for me to drink from the faucet. But now that he has this new girl, he is retaliating against Lopez, who now is not allowed to come or leave through the rear door as he said loudly to Deputy Pina. This new female CSO who he brought as his date to the wedding reception is also receiving preferential treatment, she started on dayshift, getting assigned special assignments per him and receiving other Town resource benefits. Oscar Clay has always used his power to prey on his next possible sexual conquest and he has created a hostile environment for women that don't participate.

Sent from Yahoo Mail on Android

meria rodriguez <meriameria2@yahoo> Jun 13 at 5:37 PM
To: Michael Faccenda

Good afternoon, This was the email I sent to the interim human resource director when I had decided I can't handle this stress. And hopefully they can at least do something with the situation that's going on now. Thank you very much for listening to me, Meria

Sent from Yahoo Mail on Android

1

> Show original message

Michael Faccenda You're welcome. Good luc Jun 14 at 9:59 AM

Sarah Jelic Meria: I am in receipt of your ema Jun 14 at 6:27 PM

meria rodriguez Good evening Sarah, I know Jun 14 at 7:21 PM

meria rodriguez Sent from Yahoo Mail on Ar Jun 21 at 1:46 PM



Sarah

sajelic@
(708) 65

You and Sarah Jelic have t
between June 2016 and S
him or her a message reg

Documents

Hope Assistance.p
EAP

M.Rodriguez - Tra
For your review

Update time zone

Page 5 Section 13

Subject: Re: Sexual Harassment and Retaliation

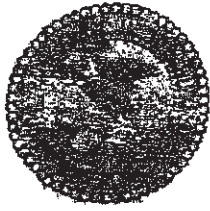
From: meriameria2@yahoo.com

To: sajelic@thetownofcicero.com; delgaldo@dlglawgroup.com; diemer@dlglawgroup.com;
larry@thetownofcicero.com

Date: Wednesday, July 25, 2018, 11:17:51 AM CDT

Good morning Mr. Klosak, I would like to file another complaint of Retaliation by Serge Rocher previous one was yesterday which I filed a paper complaint with your office. Today I was handed by Deputy Pina a new work order from Serge Rocher for new duties which entail me to drive and further more are the duties of Union CSO'S, I am administrative staff meaning I don't wear a uniform or carry a Police radio. I complained of a Sexually Hostile Environment and even though I have been in this Department since January 19th, 2018, I now am being served with new duties and guidelines of reporting.

Sent from Yahoo Mail on Android



LARRY DOMINICK
Town President

TOWN OF CICERO
4949 WEST CERMAK • CICERO, ILLINOIS 60804
708.656.3600 • FAX 708.656.5801

July 25, 2018

To: Ms. Meria Rodriguez

From: Sarah Kusper 
Interim Director of Human Resources

Re: 7/25/18 Memo

This correspondence is in reference to the memo dated July 25, 2018, issued to you from Director Serge Rocher. The Department of Human Resources learned of this memo directly from you. Issuance of this memo was not authorized by the Department of Human Resources or any other Town Official. The duties assigned in this memo are without force and effect. Immediately, you are to return to your previously assigned job duties. Any further directives will come directly from the Department of Human Resources.

Cc: Serge Rocher, Director of Community Service Officers
Ricardo Pina, Deputy Superintendent of Community Service Officers
Michael Del Galdo, Town Attorney



TOWN OF CICERO

4949 WEST CERMAK • CICERO, ILLINOIS 60804

708.656.3600 • FAX 708.656.5801

LARRY DOMINICK

Town President

July 25, 2018

To: Ms. Meria Rodriguez

From: Sarah Kuser *Sarah Kuser*
Interim Director of Human Resources

Re: 7/25/18 Memo

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Cc: Serge Rocher, Director of Community Service Officers
Ricardo Pina, Deputy Superintendent of Community Service Officers,
Michael Del Galdo, Town Attorney

TIF Task Force/ CSO Memorandum

| | |
|---|--------------------------|
| To: Meria Rodriguez | From: Director S. Rocher |
| Subject: CSO/Task Force Vehicle Maintenance | Date: July 25, 2018 |

Effective Immediately.

Your daily duties will include the regular maintenance of all CSO/Task Force Vehicles. This includes:

- Taking vehicles not in use to Fleet for fluid checks and regular maintenance.
- Taking vehicles not in use to the car wash as needed.
- Daily summaries of all vehicle maintenance and the work that is required.

Submit summaries to CSO Dep Supt R Piña's office at the end of your tour. CSO/Task Force Vehicles are located at the PSO Parking Lot and on the 3rd floor of the Town Hall parking garage. Keys to all vehicles are tagged and on CSO Dep Supt Piña's office wall. Should you require transportation to and from fleet/parking garage please call CSO/Task Force Office Phone for a CSO.

Maintain communication with Task Force Office, i.e., lunches and breaks. You are entitled to (2) fifteen min breaks and (1) thirty min lunch or combined to (1) hour.

If you should have any questions, Please contact CSO Dep Supt's Tomasino or Piña.

Cc: O.Clay, C.Tomasino, R.Piña, A.Grajeda

Human Resources Office

TIF Task Force/ CSO Memorandum

| | |
|---|--------------------------|
| To: Meria Rodriguez | From: Director S. Rocher |
| Subject: CSO/Task Force Vehicle Maintenance | Date: July 25, 2018 |

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If you should have any questions, Please contact CSO Dep Supt's Tomasino or Piña.

Cc: O.Clay, C.Tomasino, R.Piña, A.Grajeda

Human Resources Office

Town of Cicero Mail - Work Injury

Page 1 of 1



Sarah Jelic <sajelic@thetownofcicero.com>

Work Injury

1 message

meria rodriguez <

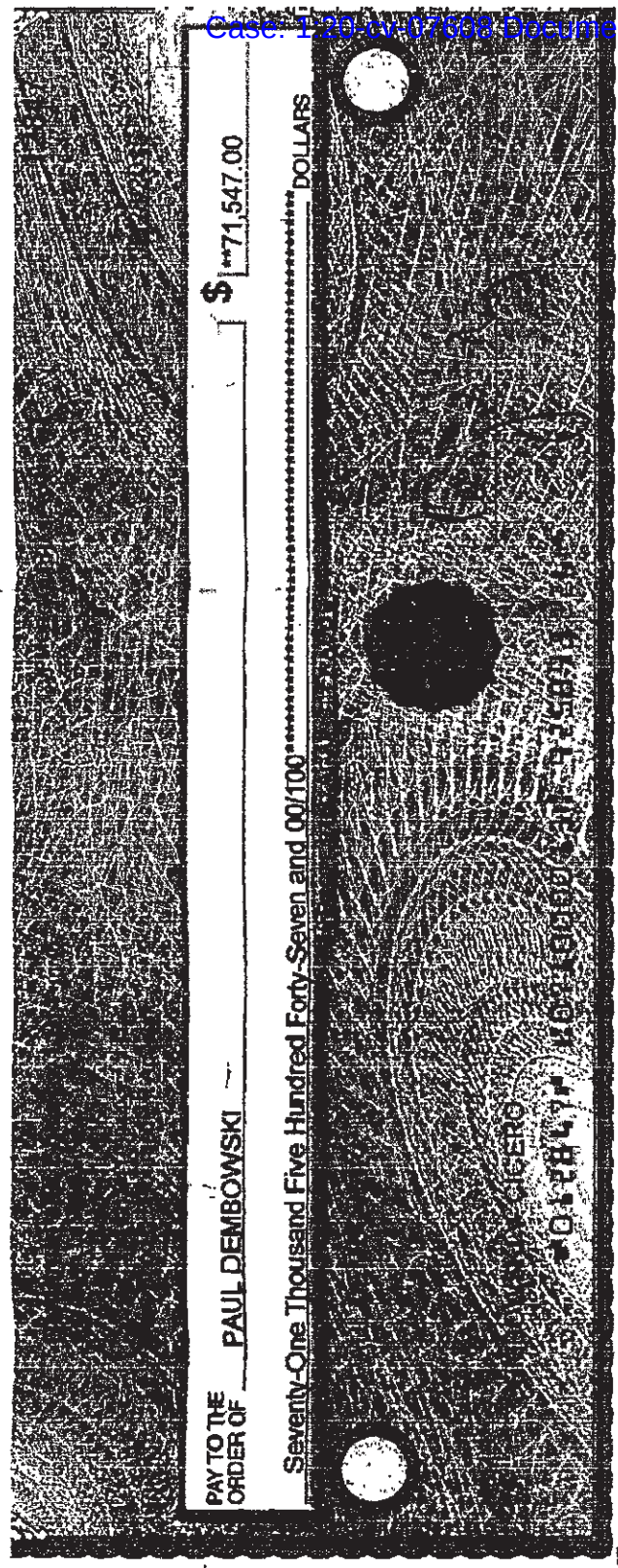
Mon, Feb 24, 2020 at 12:41 PM

Reply-To:

To: Sarah Jelic <sajelic@thetownofcicero.com>, Julie Diemer <diemer@dglawgroup.com>, Michael Del Galdo <delgaldo@dglawgroup.com>, Jim Klosak <jklosak@thetownofcicero.com>

Good afternoon Sarah, I still have not been able to file a work injury report for Workman's Comp. I was released by my doctor to return to work today with no driving for 10 days and per Dep. Polk, Chief Chlada said can't drive can't work and sent me paperwork on Saturday by email for FMLA per their request not mine. I am able to do paperwork as I have previously have done when I have been injured. I advised you and Town Attorney Del Galdo I would accept a position before I signed the Non Disclosure Agreement that didn't require driving, and again even when Dep. Rocher attempted to change my job duties in my position to drive and voiced my concerns again in the email to you prior to my transfer. I have continued care with my doctor and again shortly after being transferred back to Parking Enforcement as my pain increased in my neck and arm area from my previous accidents. Then on February 18, I injured my back, hand, shoulder and hip doing a lockout as I explained to you and Cindy Updike at the meeting on February 20th on how it happened and even showed you the bruising on my right hand. Plus I aggravated my old injury even more so than what driving all day turning my head constantly to drive and look for violations has done so that means getting in and out SUV at minimum 40 times. I still believe this transfer to Parking Enforcement is retaliation especially knowing the chances of me getting injured or re-aggravating my previous injury. I will be signing the job requirement description form under duress even though you were aware of the circumstances that I would be fulfilling the duties in pain and especially in reference to getting terminated with no paperwork or reason which in itself is a serious concern to me because of previous attempts to retaliate by my supervisors. Most importantly since I haven't been able to file an official injury report how am I getting paid for the time I have lost and the next 10 days due to this injury? Please advise as Dep. Polk isn't giving me any straight answers. Meria
Sent from Yahoo Mail on Android

Larrys brother paul Dembowski repeat sues Cicero and wins big cash for fony injurys workcomp settlements



PAY TO THE
ORDER OF PAUL DEMBOWSKI

\$ 71,547.00

Seventy-One Thousand Five Hundred Forty-Seven and 00/100 DOLLARS

Benjamin and Shepro, Ltd./Client Fund

PAUL DEMBOWSKI

Client Funds Held in Trust: PLAINTIFF

08/28/2015

12847

71,547.00

Chase IOLTA-Client D DEMBOWSKI V. CICERO

71,547.00

Page 45 Section 13



POLICY
CICERO POLICE DEPARTMENT

No.
921

| | | | |
|--|-------------------------------------|--------------|------------------|
| Subject Family Medical Leave Act (FMLA) | Effective Date November 20, 2020 | Revised Date | Total Pages 3 |
| Reference PL 103-3 - Family and Medical Leave Act of 1993 | Rescinds | Amends | |

POLICY:

The Cicero Police Department ("Department") shall comply with the provisions of the Family and Medical Leave Act of 1993 (Public Law 103-3) and the rules and regulations issued by the U.S. Department of Labor interpreting said Act (collectively referred to as "FMLA"). To the extent that there may be any conflict between the FMLA and this policy, the provisions of the FMLA shall control.

The Department shall post and keep posted at Department facilities, in conspicuous places where employees are employed, a notice that complies with any legal requirement(s) regarding such posting, including information regarding the FMLA's provisions and information concerning the procedures for filing complaints of violations of the FMLA with the Wage and Hour Division of the U.S. Department of Labor. The notice shall be posted prominently where it can be readily seen by employees and applicants for employment. <https://www.dol.gov/agencies/whd/fmla>

I. ELIGIBLE EMPLOYEE:

Only eligible employees are entitled to take FMLA leave. An "eligible employee" is one who:

1. Has worked for the Town of Cicero for at least twelve (12) months; and
2. Has at least 1,250 hours of service for the Town of Cicero during the twelve (12) month period immediately preceding the leave.

II. APPLICABILITY:

A. An eligible employee is entitled to a total of twelve (12) work weeks of leave during any rolling twelve month period for any one, or more, of the following reasons:

1. The birth of a son or daughter, and to care for the newborn child.
2. The placement with the employee of a son or daughter for adoption or foster care.
3. To care for the employee's spouse, son, daughter, or parent with a serious health condition; and,
4. Because of a serious health condition that makes the employee unable to perform the essential functions of his or her job.
5. Because of any qualifying exigency (as defined by applicable federal regulations) arising out of the fact that the spouse, son, daughter, or parent of the employee is on active duty (or has been notified of an impending call or order to active duty) in the Armed Forces in support of a contingency operation.

Page 1 of 1



Sarah Jelic <sajelic@thetownofcicero.com>

1 message

Mon, Feb 24, 2020 at 12:41 PM

To: Sarah Jelic <sajelic@thetownofcicero.com>, Julie Diemer <diemer@dlglawgroup.com>, Michael Del Galdo <delgaldo@dlglawgroup.com>, Jim Klosak <jklosak@thetownofcicero.com>

Good afternoon Sarah, I still have not been able to file a work injury report for Workman's Comp. I was released by my doctor to return to work today with no driving for 10 days and per Dep. Polk, Chief Chlada said can't drive can't work and sent me paperwork on Saturday by email for FMLA per their request not mine. I am able to do paperwork as I have previously have done when I have been injured. I advised you and Town Attorney Del Galdo I would accept a position before I signed the Non Disclosure Agreement that didn't require driving, and again even when Dep. Rocher attempted to change my job duties in my position to drive and voiced my concerns again in the email to you prior to my transfer. I have continued care with my doctor and again shortly after being transferred back to Parking Enforcement as my pain increased in my neck and arm area from my previous accidents. Then on February 18, I injured my back, hand, shoulder and hip doing a lockout as I explained to you and Cindy Updike at the meeting on February 20th on how it happened and even showed you the bruising on my right hand. Plus I aggravated my old injury even more so than what driving all day turning my head constantly to drive and look for violations has done so that means getting in and out SUV at minimum 40 times. I still believe this transfer to Parking Enforcement is retaliation especially knowing the chances of me getting injured or re-aggravating my previous injury. I will be signing the job requirement description form under duress even though you were aware of the circumstances that I would be fulfilling the duties in pain and especially in reference to getting terminated with no paperwork or reason which in itself is a serious concern to me because of previous attempts to retaliate by my supervisors. Most importantly since I haven't been able to file an official injury report how am I getting paid for the time I have lost and the next 10 days due to this injury? Please advise as Dep. Polk isn't giving me any straight answers. Meria

Sent from Yahoo Mail on Android

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The Town of Cicero


Larry Dominick, Town President

Office of the Inspector General
James J. Klosak

MEMORANDUM

Date: 12 October 2011

To: Derek Dominick, Human Resources Department
Dep. Supt Dan Wolff, CSO Department

From: James J. Klosak 

Re: CSO Meria Rodriguez disciplinary history-personnel file

The personnel file of CSO Meria Rodriguez was reviewed, and found to contain incomplete employee disciplinary documents. The disciplinary documents are not signed by CSO Rodriguez, or the CSO supervisor issuing the discipline. Furthermore, there is no indication that a CSO supervisor ever discussed the disciplinary action with CSO Rodriguez.

The OIG finds CSO Rodriguez' personnel file contains disciplinary documents that are incomplete, thus invalid. The OIG recommends the immediate removal of all employee disciplinary related documents from CSO Rodriguez' personnel files maintained at the HR Dept, CSO Dept, and Cicero Police Department.


James J. Klosak

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